

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

JENNEL BLACK, et al.

*

Plaintiffs

*

v.

*

Case #: 1:20-cv-03644-CCB

THOMAS WEBSTER IV, et al.

*

Defendants

*

* * * * *

ANSWER PRESENTING DEFENSES TO AMENDED COMPLAINT

MICHAEL PETYO and JEANNETTE L. CLEVELAND, two of the Defendants, by KARPINSKI, CORNBROOKS & KARP, P.A. and DANIEL KARP, their attorneys, respond to the Amended Complaint and Election of Jury as follows:

RULE 12(b)(6) DEFENSES

1. The Amended Complaint fails to state a claim upon which relief may be granted.

ANSWER

2. To the extent any answer to paragraph 1 is required, the allegations are denied.

3. To the extent any answer to paragraph 2 is required, the allegations are denied.

4. To the extent any answer to paragraph 3 is required, the allegations are denied.

5. The allegations contained in paragraph 4 are admitted.

6. The allegations contained in paragraph 5 are admitted.

7. The allegations contained in paragraph 6 are admitted.

8. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 7.

9. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 8.

10. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 9.

11. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 10.

12. Defendants deny the allegations contained in paragraph 11.

13. Defendants deny the allegations contained in paragraph 12.

14. Defendants admit the allegations contained in paragraph 13.

15. Defendants admit the allegation in paragraph 14 that Michael Petyo was the Chief of Police for the Town of Greensboro but deny all other allegations in that paragraph.

16. Defendants admit the allegation in paragraph 15 that Gary Manos was the Chief of Police for the Town of Ridgely but deny all other allegations in that paragraph.

17. Defendants admit the allegation in paragraph 16 that Dennis Lannon is a police officer for the Town of Centreville but deny all other allegations in that paragraph.

18. Defendants admit the allegations in paragraph 17 that Jeannette

Cleveland was the Town Manager for the Town of Greensboro but deny all other allegations in that paragraph.

19. Defendants admit the allegations contained in the first sentence of paragraph 18 but deny all of the rest of the allegations contained in that paragraph.

20. Defendants admit the allegations contained in the first sentence of paragraph 19 but deny all of the rest of the allegations contained in that paragraph.

21. Defendants admit the allegations contained in the first sentence of paragraph 20 but deny all of the rest of the allegations contained in that paragraph.

22. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 21.

23. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 22.

24. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 23.

25. Defendants admit the allegations contained in paragraph 24.

26. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 25.

27. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 26.

28. Defendants are without sufficient knowledge or information to admit

or deny the allegations contained in paragraph 27.

29. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 28.

30. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 29.

31. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 30.

32. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 31.

33. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 32.

34. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 33.

35. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 34.

36. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 35.

37. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 36.

38. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 37.

39. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 38.

40. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 39.

41. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 40.

42. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 41.

43. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 42.

44. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 43.

45. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 44.

46. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 45.

47. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 46.

48. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 47.

49. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 48.

50. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 49.

51. Defendants are without sufficient knowledge or information to admit

or deny the allegations contained in paragraph 50.

52. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 51.

53. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 52.

54. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 53.

55. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 54.

56. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 55.

57. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 56.

58. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 57.

59. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 58.

60. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 59.

61. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 60.

62. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 61.

63. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 62.

64. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 63.

65. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 64.

66. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 65.

67. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 66.

68. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 67.

69. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 68.

70. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 69.

71. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 70.

72. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 71.

73. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 72.

74. Defendants are without sufficient knowledge or information to admit

or deny the allegations contained in paragraph 73.

75. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 74.

76. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 75.

77. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 76.

78. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 77.

79. Defendants admit the allegations contained in paragraph 78.

80. Defendants admit the allegations contained in paragraph 79.

81. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 80.

82. Defendants admit the allegations contained in paragraph 81 that Officer Webster responded to the 911 call and that when he arrived on the scene, he activated his body worn camera. All other allegations contained in that paragraph are denied.

83. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 82.

84. Defendants deny the allegations contained in paragraph 83.

85. Defendants admit that Anton stated that he was X.B.'s brother and that X.B. stated that he was not his brother but deny all the other allegations contained in paragraph 84.

86. Defendants admit that Anton was told to put his hands behind his back and said “I love you” before fleeing but deny all the other allegations contained in paragraph 85.

87. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 86.

88. Defendants deny the allegations contained in paragraph 87.

89. Defendants admit only that Officer Webster pursued Anton on foot but deny all the other allegations contained in paragraph 88.

90. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 89.

91. Defendants admit the allegations contained in paragraph 90.

92. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 91.

93. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 92.

94. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 93.

95. Defendants deny the allegations contained in paragraph 94.

96. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 95.

97. Defendants admit the allegations contained in paragraph 96.

98. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 97.

99. Defendants deny the allegations contained in paragraph 98.

100. Defendants deny the allegations contained in paragraph 99.

101. Defendants admit that Anton was locked in a vehicle as alleged in paragraph 100 but deny all the other allegations contained in that paragraph.

102. Defendants deny the allegations contained in paragraph 101.

103. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 102.

104. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 103.

105. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 104.

106. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 105.

107. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 106.

108. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 107.

109. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 108.

110. Defendants deny the allegations contained in paragraph 109.

111. Defendants deny the allegations contained in paragraph 110.

112. Defendants deny the allegations contained in paragraph 111.

113. Defendants deny the allegations contained in paragraph 112.

114. Defendants deny the allegations contained in paragraph 113.
115. Defendants deny the allegations contained in paragraph 114.
116. Defendants deny the allegations contained in paragraph 115.
117. Defendants deny the allegations contained in paragraph 116.
118. Defendants deny the allegations contained in paragraph 117.
119. Defendants deny the allegations contained in paragraph 118.
120. Defendants deny the allegations contained in paragraph 119.
121. Defendants deny the allegations contained in paragraph 120.
122. Defendants deny the allegations contained in paragraph 121.
123. Defendants deny the allegations contained in paragraph 122.
124. Defendants deny the allegations contained in paragraph 123.
125. Defendants deny the allegations contained in paragraph 124.
126. Defendants deny the allegations contained in paragraph 125.
127. Defendants admit the allegation in paragraph 126 that the taser was ineffective but deny all the other allegations contained in that paragraph.
128. Defendants deny the allegations contained in paragraph 127.
129. Defendants deny the allegations contained in paragraph 128.
130. Defendants deny the allegations contained in paragraph 129.
131. Defendants deny the allegations contained in paragraph 130.
132. Defendants deny the allegations contained in paragraph 131.
133. Defendants deny the allegations contained in paragraph 132.
134. Defendants deny the allegations contained in paragraph 133.
135. Defendants deny the allegations contained in paragraph 134.

136. Defendants deny the allegations contained in paragraph 135.

137. Defendants deny the allegations contained in paragraph 136.

138. Defendants deny the allegations contained in paragraph 137.

139. Defendants deny the allegations contained in paragraph 138.

140. Defendants deny the allegations contained in paragraph 139.

141. Defendants deny the allegations contained in paragraph 140.

142. Defendants deny the allegations contained in paragraph 141.

143. Defendants deny the allegations contained in paragraph 142.

144. Defendants deny the allegations contained in paragraph 143.

145. Defendants deny the allegations contained in paragraph 144.

146. Defendants deny the allegations contained in paragraph 145.

147. Defendants deny the allegations contained in paragraph 146.

148. Defendants deny the allegations contained in paragraph 147.

149. Defendants deny the allegations contained in paragraph 148.

150. Defendants deny the allegations contained in paragraph 149.

151. Defendants deny the allegations contained in paragraph 150.

152. Defendants deny the allegations contained in paragraph 151.

153. Defendants deny the allegations contained in paragraph 152.

154. Defendants deny the allegations contained in paragraph 153.

155. Defendants deny the allegations contained in paragraph 154.

156. Defendants deny the allegations contained in paragraph 155.

157. Defendants admit the allegations contained in paragraph 156.

158. Defendants admit that efforts to resuscitate Anton were

unsuccessful as alleged in paragraph 157 but deny the rest of the allegations contained in that paragraph.

159. Defendants deny the allegations contained in paragraph 158.

160. Defendants deny the allegations contained in paragraph 159.

161. Defendants deny the allegations contained in paragraph 160.

162. Defendants deny the allegations contained in paragraph 161.

163. Defendants deny the allegations contained in paragraph 162.

164. Defendants deny the allegations contained in paragraph 163.

165. Defendants deny the allegations contained in paragraph 164.

166. Defendants deny the allegations contained in paragraph 165.

167. Defendants deny the allegations contained in paragraph 166.

168. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 167.

169. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 168.

170. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 169.

171. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 170.

172. Defendants deny the allegations contained in paragraph 171.

173. Defendants deny the allegations contained in paragraph 172.

174. Defendants deny the allegations contained in paragraph 173.

175. Defendants deny the allegations contained in paragraph 174.

176. Defendants deny the allegations contained in paragraph 175.

177. Defendants deny the allegations contained in paragraph 176.

178. Defendants deny the allegations contained in paragraph 177.

179. Defendants deny the allegations contained in paragraph 178.

180. Defendants deny the allegations contained in paragraph 179.

181. Defendants deny the allegations contained in paragraph 180.

182. Defendants deny the allegations contained in paragraph 181.

183. Defendants deny the allegations contained in paragraph 182.

184. Defendants deny the allegations contained in paragraph 183.

185. Defendants deny the allegations contained in paragraph 184.

186. Defendants deny the allegations contained in paragraph 185.

187. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 186.

188. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 187.

189. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 188.

190. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 189.

191. Defendants deny the allegations contained in paragraph 190.

192. Defendants deny the allegations contained in paragraph 191.

193. Defendants deny the allegations contained in paragraph 192.

194. Defendants deny the allegations contained in paragraph 193.

195. Defendants deny the allegations contained in paragraph 194.

196. Defendants deny the allegations contained in paragraph 195.

197. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 196.

198. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 197.

199. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 198.

200. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 199.

201. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 200.

202. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 201.

203. Defendants deny the allegations contained in paragraph 202.

204. Defendants deny the allegations contained in paragraph 203.

205. Defendants deny the allegations contained in paragraph 204.

206. Defendants deny the allegations contained in paragraph 205.

207. Defendants deny the allegations contained in paragraph 206.

208. Defendants deny the allegations contained in paragraph 207.

209. Defendants deny the allegations contained in paragraph 208.

210. In response to paragraph 209, Defendants adopt and incorporate by reference their previous responses.

211. Defendants admit the allegations contained in paragraph 210.

212. Defendants admit the allegations contained in paragraph 211.

213. Defendants deny the allegations contained in paragraph 212.

214. Defendants deny the allegations contained in paragraph 213.

215. Defendants deny the allegations contained in paragraph 214.

216. Defendants deny the allegations contained in paragraph 215.

217. Defendants deny the allegations contained in paragraph 216.

218. Defendants deny the allegations contained in paragraph 217.

219. In response to paragraph 218, Defendants adopt and incorporate by reference their previous responses.

220. Defendants admit the allegations contained in paragraph 219.

221. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 220.

222. Defendants deny the allegations contained in paragraph 221.

223. Defendants deny the allegations contained in paragraph 222.

224. Defendants deny the allegations contained in paragraph 223.

225. In response to paragraph 224, Defendants adopt and incorporate by reference their previous responses.

226. Defendants admit the allegations contained in paragraph 225.

227. Defendants deny the allegations contained in paragraph 226.

228. Defendants are without sufficient knowledge or information to admit or deny the allegations contained in paragraph 227.

229. Defendants are without sufficient knowledge or information to admit

or deny the allegations contained in paragraph 228.

230. Defendants admit the allegations contained in paragraph 229.

231. Defendants deny the allegations contained in paragraph 230.

232. Defendants deny the allegations contained in paragraph 231.

233. Defendants deny the allegations contained in paragraph 232.

234. Defendants deny the allegations contained in paragraph 233.

235. Defendants deny the allegations contained in paragraph 234.

236. Defendants deny the allegations contained in paragraph 235.

237. Defendants deny the allegations contained in paragraph 236.

238. Defendants deny the allegations contained in paragraph 237.

239. Defendants deny the allegations contained in paragraph 238.

240. Defendants deny the allegations contained in paragraph 239.

241. In response to paragraph 240, Defendants adopt and incorporate by reference their previous responses.

242. Defendants do not believe that any response is required to paragraph 241 as they are not parties to Count IV. However, if a response is required, the allegations are denied.

243. Defendants do not believe that any response is required to paragraph 242 as they are not parties to Count IV. However, if a response is required, the allegations are denied.

244. Defendants do not believe that any response is required to paragraph 243 as they are not parties to Count IV. However, if a response is required, the allegations are denied.

245. Defendants do not believe that any response is required to paragraph 244 as they are not parties to Count IV. However, if a response is required, the allegations are denied.

246. Defendants do not believe that any response is required to paragraph 245 as they are not parties to Count IV. However, if a response is required, the allegations are denied.

247. Defendants do not believe that any response is required to paragraph 246 as they are not parties to Count IV. However, if a response is required, the allegations are denied.

248. In response to paragraph 247, Defendants adopt and incorporate by reference their previous responses.

249. Defendants do not believe that any response is required to paragraph 248 as they are not parties to Count V. However, if a response is required, the allegations are denied.

250. Defendants do not believe that any response is required to paragraph 249 as they are not parties to Count V. However, if a response is required, the allegations are denied.

251. Defendants do not believe that any response is required to paragraph 250 as they are not parties to Count V. However, if a response is required, the allegations are denied.

252. Defendants do not believe that any response is required to paragraph 251 as they are not parties to Count V. However, if a response is required, the allegations are denied.

253. In response to paragraph 252, Defendants adopt and incorporate by reference their previous responses.

254. Defendants do not believe that any response is required to paragraph 253 as they are not parties to Count VI. However, if a response is required, the allegations are denied.

255. Defendants do not believe that any response is required to paragraph 254 as they are not parties to Count VI. However, if a response is required, the allegations are denied.

256. Defendants do not believe that any response is required to paragraph 255 as they are not parties to Count VI. However, if a response is required, the allegations are denied.

257. Defendants do not believe that any response is required to paragraph 256 as they are not parties to Count VI. However, if a response is required, the allegations are denied.

258. Defendants do not believe that any response is required to paragraph 257 as they are not parties to Count VI. However, if a response is required, the allegations are denied.

259. In response to paragraph 258, Defendants adopt and incorporate by reference their previous responses.

260. Defendants do not believe that any response is required to paragraph 259 as they are not parties to Count VII. However, if a response is required, the allegations are denied.

261. Defendants do not believe that any response is required to

paragraph 260 as they are not parties to Count VII. However, if a response is required, the allegations are denied.

262. Defendants do not believe that any response is required to paragraph 261 as they are not parties to Count VII. However, if a response is required, the allegations are denied.

263. Defendants do not believe that any response is required to paragraph 262 as they are not parties to Count VII. However, if a response is required, the allegations are denied.

264. Defendants do not believe that any response is required to paragraph 263 as they are not parties to Count VII. However, if a response is required, the allegations are denied.

265. Defendants do not believe that any response is required to paragraph 264 as they are not parties to Count VII. However, if a response is required, the allegations are denied.

266. In response to paragraph 265, Defendants adopt and incorporate by reference their previous responses.

267. Defendants deny the allegations contained in paragraph 266.

268. Defendants deny the allegations contained in paragraph 267.

269. Defendants deny the allegations contained in paragraph 268.

270. Defendants deny the allegations contained in paragraph 269.

271. Defendants deny the allegations contained in paragraph 270.

272. Defendants deny the allegations contained in paragraph 271.

273. Defendants deny the allegations contained in paragraph 272.

274. In response to paragraph 273, Defendants adopt and incorporate by reference their previous responses.

275. Defendants do not believe that any response is required to paragraph 274 as they are not parties to Count IX. However, if a response is required, the allegations are denied.

276. Defendants do not believe that any response is required to paragraph 275 as they are not parties to Count IX. However, if a response is required, the allegations are denied.

277. Defendants do not believe that any response is required to paragraph 276 as they are not parties to Count IX. However, if a response is required, the allegations are denied.

278. In response to paragraph 277, Defendants adopt and incorporate by reference their previous responses.

279. Defendants do not believe that any response is required to paragraph 278 as they are not parties to Count X. However, if a response is required, the allegations are denied.

280. Defendants do not believe that any response is required to paragraph 279 as they are not parties to Count X. However, if a response is required, the allegations are denied.

281. Defendants do not believe that any response is required to paragraph 280 as they are not parties to Count X. However, if a response is required, the allegations are denied.

282. Defendants do not believe that any response is required to

paragraph 281 as they are not parties to Count X. However, if a response is required, the allegations are denied.

283. Defendants do not believe that any response is required to paragraph 282 as they are not parties to Count X. However, if a response is required, the allegations are denied.

284. Defendants do not believe that any response is required to paragraph 283 as they are not parties to Count X. However, if a response is required, the allegations are denied.

285. Defendants do not believe that any response is required to paragraph 284 as they are not parties to Count X. However, if a response is required, the allegations are denied.

286. Defendants do not believe that any response is required to paragraph 285 as they are not parties to Count X. However, if a response is required, the allegations are denied.

287. Defendants do not believe that any response is required to paragraph 286 as they are not parties to Count X. However, if a response is required, the allegations are denied.

288. Defendants do not believe that any response is required to paragraph 287 as they are not parties to Count X. However, if a response is required, the allegations are denied.

289. In response to paragraph 288, Defendants adopt and incorporate by reference their previous responses.

290. Defendants do not believe that any response is required to

paragraph 289 as they are not parties to Count XI. However, if a response is required, the allegations are denied.

291. Defendants do not believe that any response is required to paragraph 290 as they are not parties to Count XI. However, if a response is required, the allegations are denied.

292. Defendants do not believe that any response is required to paragraph 291 as they are not parties to Count XI. However, if a response is required, the allegations are denied.

293. Defendants do not believe that any response is required to paragraph 292 as they are not parties to Count XI. However, if a response is required, the allegations are denied.

294. Defendants do not believe that any response is required to paragraph 293 as they are not parties to Count XI. However, if a response is required, the allegations are denied.

295. Defendants do not believe that any response is required to paragraph 294 as they are not parties to Count XI. However, if a response is required, the allegations are denied.

296. Defendants do not believe that any response is required to paragraph 295 as they are not parties to Count XI. However, if a response is required, the allegations are denied.

297. Defendants do not believe that any response is required to paragraph 296 as they are not parties to Count XI. However, if a response is required, the allegations are denied.

298. Defendants do not believe that any response is required to paragraph 297 as they are not parties to Count X. However, if a response is required, the allegations are denied.

299. Defendants do not believe that any response is required to paragraph 298 as they are not parties to Count XI. However, if a response is required, the allegations are denied.

300. Defendants do not believe that any response is required to paragraph 299 as they are not parties to Count XI. However, if a response is required, the allegations are denied.

301. Defendants do not believe that any response is required to paragraph 300 as they are not parties to Count XI. However, if a response is required, the allegations are denied.

302. In response to paragraph 301, Defendants adopt and incorporate by reference all previous responses.

303. Defendants deny the allegations contained in paragraph 302, although they note that Defendant Cleveland is not a party to Count XII.

304. Defendants deny the allegations contained in paragraph 303, although they note that Defendant Cleveland is not a party to Count XII.

305. Defendants deny the allegations contained in paragraph 304, although they note that Defendant Cleveland is not a party to Count XII.

306. Defendants deny the allegations contained in paragraph 305, although they note that Defendant Cleveland is not a party to Count XII.

307. Defendants deny the allegations contained in paragraph 306,

although they note that Defendant Cleveland is not a party to Count XII.

308. Defendants deny the allegations contained in paragraph 307, although they note that Defendant Cleveland is not a party to Count XII.

309. In response to paragraph 308, Defendants adopt and incorporate by reference their previous responses.

310. Defendants deny the allegations contained in paragraph 309.

311. Defendants deny the allegations contained in paragraph 310.

312. Defendants deny the allegations contained in paragraph 311.

313. Defendants deny the allegations contained in paragraph 312.

314. Defendants deny the allegations contained in paragraph 313.

315. Defendants deny the allegations contained in paragraph 314.

316. In response to paragraph 315, Defendants adopt and incorporate by reference their previous responses.

317. Defendants deny the allegations contained in paragraph 316.

318. Defendants deny the allegations contained in paragraph 317.

319. Defendants deny the allegations contained in paragraph 318.

320. Defendants deny the allegations contained in paragraph 319.

321. Defendants deny the allegations contained in paragraph 320.

AFFIRMATIVE DEFENSES

322. Defendants are entitled to qualified immunity as to any federal claims.

323. Defendants are entitled to statutory and common law public official immunity as to any state claims.

324. Defendants are entitled to the privileges, immunities, protections, and limits of liability and damages set forth in the Local Government Tort Claims Act as to any state claims.

325. Defendants' alleged actions and/or omissions were objectively reasonable and legally justified.

326. Defendants' alleged actions and/or omissions were legally privileged.

327. Defendants did not act unlawfully or otherwise violate any of the Plaintiff's rights.

328. Defendants did not cause or contribute to Anton Black's death, injuries, and/or damages, if any.

329. The damages which may be awarded are limited by law.

330. Some Plaintiffs lack standing to seek certain damages and/or remedies.

331. Anton Black's own negligence, lack of care and/or unreasonable actions caused and/or contributed to his own injuries and/or damages.

332. Anton Black assumed the risk of his own injuries and/or damages.

333. Anton Black's death, and any injuries and/or damages were caused by third parties and not the answering Defendants.

334. Plaintiffs are not entitled to any equitable relief.

KARPINSKI, CORNBROOKS & KARP, P.A.

BY: /s/ Daniel Karp
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*Attorney for Michael Petyo and Jennette
Cleveland*

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of February 2022, a copy of the foregoing was electronically filed, with notice to:

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Jeannette Cleveland